

Dear Reviewer:

I have been licensed for more than 40 years and consider RM-10867 appropriate and necessary for a more effective amateur radio service now and in the future. By implementing RM-10867 in its entirety, the Commission will substantially improve the amateur service's ability to deliver on its most fundamental purpose, emergency communications.

Radio spectrum authorized for the amateur service supports emergency communications within and without geographic regions of every description. Local communications are typically conducted on VHF/UHF bands. HF bands support regional, national and international communications. While community disaster preparedness and response are top priorities for the amateur service, we are presently unable to deploy all of our available resources (human and radio spectrum) in a comprehensive manner due to licensing regulations requiring Morse code proficiency for access to HF amateur bands. It is my hope the Commission will scrutinize this regulation in light of new international treaty and find it to be both unnecessary as a matter of law and contrary to the public interest which is best served by the largest possible reservoir of amateurs providing voluntary communication service when needed.

Amateur frequencies in the 7.0 MHz (40 Meter) and 3.5 MHz (80/75 Meter) HF spectrum are used extensively for emergency preparedness training. When circumstances warrant, the Commission declares a state of emergency on frequencies within these HF bands. At present, fewer than 49%\* of amateur licensees are authorized to contribute to these efforts. This inefficiency is a carry-over from now outdated international treaty and outdated license-class privileges which were defined long before today's heightened concern with homeland security.

Through removal of the Morse Code barrier to HF access, merging of Technician Class into General Class and expanded privileges for a new Beginner Class license, RM-10867 proposes access to this important HF spectrum by all licensed amateurs. In granting access, the Commission will expand the reservoir by approximately 355,000\* additional licensees. This is consistent with §97.1 Basis and purpose (a) ... "Enhancing the value of the amateur service to the public"; and (d) ... "Expansion of the existing reservoir within the amateur radio service of trained operators, technicians, and electronics experts."

The very first time a newly enabled licensee becomes a key contributor to HF emergency communications from the right place at the right time, contradicting arguments about what's best for amateur radio and the public welfare will become moot. I urge the Commission to accept RM-10867 in its entirety.

Respectfully Submitted,

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\*Data from FCC License Count